

Perry's time re: 1983 claims		
DATE	HOURS	DESCRIPTION
7/16/2018	0.8	Draft Retainer Agreement re: 1983 Actions and FHA
7/23/2018	5.5	Begin research for Complaint re: False Arrest; Excessive Force; Failure to Intervene
7/24/2018	2.2	Research re: Malicious Prosecution for Complaint
7/25/2018	0.2	Draft email to George re: malicious prosecution claim
2/5/2019	2.8	Continue research re: false arrest; excessive force
2/6/2019	3.2	Continue research re: excessive force
2/7/2019	1	Continue research re: failure to intervene
2/8/2018	0.1	Draft email to George re: excessive force
2/8/2019	1.2	Continue research re: excessive force
2/18/2019	1.8	Research re: elements of NY disorderly conduct
2/19/2019	1.5	Research re: elements of NY resisting arrest and assault 2nd
6/3/2019	1.4	Research re: False Arrest and Compensatory Damages
6/6/2019	3.4	Research re: Malicious Prosecution; Draft email to George re: Same
6/7/2019	0.1	Draft Second Email to George re: Malicious Prosecution Claim
6/7/2019	3.8	Research First Amendment 1983 Claims
6/9/2019	4.2	Research re: malicious prosecution and begin drafting malicious prosecution count for Amended Complaint
6/9/2019	2.8	Continue research First Amendment 1983 claims and draft First Amendment Count
6/10/2019	3	Review and revise Draft of P's First Amended Complaint and continue researching malicious prosecution
6/13/2019	3.4	Continue reviewing and revising drafts of P's First Amended Complaint and Research re: False Arrest
6/21/2019	0.8	Tel Conferences w/ George re: 1983 attorneys' fees; discovery topics
8/16/2019	0.3	Research re: NY Civil Rights Law Sec 50-a
1/2/2020	0.1	Research Mal. Pros. re: sufficient evidence prosecution ended indicates innocence and draft mem of law re: same
3/4/2020	0.1	Review email from George re: Malicious Prosecution and First Amendment Retaliation Claims
3/11/2020	3.2	Review First Amendment research and draft Memo of Law Opp to SJ section re: First Amendment claims

3/16/2020	2.4	Continue drafting memo of law in opp to SJ section re: criminal charges dismissed show innocence
7/17/2021	3.2	Draft, review, and revise Jury Instructions re: false arrest, excessive force, failure to intervene
8/20/2021	2.5	Research First Amendment 1983 Claims
8/25/2021	3.2	Research and draft First Amendment Retaliation Jury Instruction
8/26/2021	2.8	Continue research First Amendment 1983 claims and review and revise draft First Amendment Jury Instructions
9/1/2021	4.3	Cont. drafting and revising P's jury instructions re: mal. Pros., false arrest, excessive force, fail to inter, punitive damages
9/6/2021	3.2	Cont. drafting and revising P's jury instructions re: mal. Pros., false arrest, excessive force, fail to inter, punitive damages
9/7/2021	3.5	Cont. drafting and revising P's jury instructions re: mal. Pros., false arrest, excessive force, fail to inter, punitive damages
9/10/2021	1	Cont. drafting and revising P's jury instructions re: mal. Pros., false arrest, excessive force, fail to inter, punitive damages
9/13/2021	0.5	Cont. drafting and revising P's jury instructions re: mal. Pros., false arrest, excessive force, fail to inter, punitive damages
2/7/2022	0.8	Draft Amended Malicious Prosecution Jury Instruction re: Strype
4/4/2022	1.4	Research re: Recent Supreme Court Decisions 1983 actions
4/5/2022	1.6	Draft Letter to Court re: Thompson v. Clark, 596 U.S. __ {2022} Malicious Prosecution Proof of Innocence
4/6/2022	0.8	Review and Edit Letter to Court re: Thompson v. Clark, 596 U.S. __ (2022)
7/19/2022	0.5	Amend Plaintiffs Verdict Form re: Malicious Prosecution
12/3/2022	0.3	Review D.s' Supp Motion in Limine re: P not entitled to jury trial on wage loss claim 1983 actions
12/8/2022	2.5	Continue research re: Bifurcation of punitive damages in 1983 claims
12/8/2022	3.3	Continue Research 1983 punitive damage amounts for false arrest and malicious prosecution
12/9/2022	4.2	Research re: right to jury trial on 1983 wage loss claims
12/9/2022	3.5	Research re: right to jury trial 1983 wage loss claims
12/10/2022	2	Research re: right to jury trial on 1983 wage loss claims
12/10/2022	4.5	Draft memo of law re: right jury trial on 1983 wage loss claims; bifurcation of punitive damages

12/11/2022	2.4	Research Title VII claims re: wage loss by court or jury
12/14/2022	2.5	Continue to draft memo of law re: right to jury trial on 1983 wage loss claims
12/15/2022	2.8	Continue to draft, review, revise memo in law re: right to jury trial 1983 wage loss
12/15/2022	2.1	Continue research re: 1983 right to jury trial on lost wages
12/16/2022	2.4	Review and revise memo in opp to D.s' supplemental motions in limine re: 1983 jury trial wage loss
3/29/2023	4.5	Review research re: 1983 actions; review depo transcripts: Cohen; Seidita; Strype; Martin; Hicks re: trial preparation
3/30/2023	1.5	Review 1983 Caselaw re: jury verdict form
4/12/2023	3.3	Review pattern jury instructions re: 1983 claims re: amending jury instructions and verdict form re: damages
4/16/2023	1.6	Review Plaintiffs Amended Proposed Jury Instructions and 1983 case law
4/18/2023	3.5	Research Burden of Proof re: False Arrest and draft email memo to Court re: same
6/16/2023	2.5	Research re: attorneys' fee applications and amounts in S.D.N.Y. 1983 actions
Total Hours	128	